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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

KATHLEEN VICTORIA ESPARZA,	}	Case No.: 2:23-CV-00681-AC
Plaintiff,		STIPULATION AND [PROPOSED] ORDER
vs.		FOR AN EXTENSION OF TIME
KILOLO KIJAKAZI,		
Acting Commissioner of Social Security,		
Defendant.	}	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from September 11, 2023 up to and including October 11, 2023. This is the Defendant's first request for an extension.

Defendant requests this extension in order to further consider the more than 2,700 page administrative record in light of the issues raised in Plaintiff's motion. The undersigned has a number of competing deadlines in pending disability cases, and was out of the office from August 28, 2023, until September 5, 2023.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: September 6, 2023

/s/ Meghan O. Lambert*

(*as authorized via e-mail on September 6, 2023)

MEGHAN O. LAMBERT

Attorney for Plaintiff

Dated: September 6, 2023

PHILLIP A. TALBERT

United States Attorney

MATHEW W. PILE

Associate General Counsel

Social Security Administration

By: /s/ Erin A. Jurrens

ERIN A. JURRENS

Special Assistant U.S. Attorney

Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including October 11, 2023, to respond to Plaintiff's Motion for Summary Judgment.

DATED: September 5, 2023.



ALLISON CLAIRE

UNITED STATES MAGISTRATE JUDGE